



U.S. Department of Energy
Office of River Protection

P.O. Box 450, MSIN H6-60
Richland, Washington 99352

0072069

07-TPD-002

JAN 26 2007

Ms. Jane A. Hedges, Program Manager
Nuclear Waste Program
Washington State
Department of Ecology
3100 Port of Benton Blvd.
Richland, Washington 99354

RECEIVED
JAN 30 2007

EDMC

Dear Ms. Hedges:

REVISION OF PERMIT CONDITIONS III.11.I.2.a.ii AND III.11.I.5.a FOR THE
INTEGRATED DISPOSAL FACILITY (IDF)

Reference: Ecology letter from J. A. Hedges to R. J. Schepens, ORP, et. al., "Re: *Modification of the Hanford Facility Resource Conservation and Recovery Act Permit for the Treatment, Storage, and Disposal of Dangerous Waste* (WA7890008967), Revision 8 to Incorporate Final Permit Conditions for the Integrated Disposal Facility," dated March 10, 2006. 0068956

The U.S. Department of Energy (DOE), Office of River Protection (ORP) is working with the Washington State Department of Ecology (Ecology) to modify the IDF permit to place the facility in a custodial care condition. The purpose of this letter is to provide the technical basis for revision of IDF permit deliverables associated with the risk analyses for the facility.

Future waste disposal in and operation of the IDF will be addressed under the Tank Closure and Waste Management (TC & WM) Environmental Impact Statement (EIS) that is currently under development with Ecology as a Cooperating Agency. Pending completion of the TC & WM EIS and issuance of a Record of Decision (ROD), ORP has placed the IDF in a custodial care phase and will maintain and monitor this facility to ensure it retains the integrity of a permitted waste disposal facility. The IDF Permit requires preparation of a risk budget tool that models the risks of long-term disposal of waste at the IDF. DOE anticipates that the TC & WM EIS and associated ROD will identify wastes to be disposed in the IDF and the modeling tools required for DOE to develop and prepare the appropriate risk budget tools for IDF operation consistent with the IDF Permit.¹

Specifically, the IDF Permit requires submittal of a glass performance assessment (Condition III.11.I.2.a.ii) by January 31, 2007, and also requires a "risk-budget tool" (Condition III.11.I.5.a) to be submitted by April 30, 2007. Since operation and placement of waste into the IDF is not planned in the immediate future, ORP is providing an updated technical basis for the delivery of these permit requirements.

¹ DOE has not, and cannot, make decisions regarding the IDF until the Final TC & WM EIS and a ROD are issued.

JAN 26 2007

ORP's objectives for these risk analyses includes continued commitment to the existing permit deliverables, ensuring consistency with the TC & WM EIS ROD for wastes expected to be disposed in the facility and the utilization of the modeling tools developed through the TC & WM EIS. ORP anticipates the following sequence of activities for the issuance of the IDF Permit deliverables to allow coordination with TC & WM EIS activities (attached):

For disposal of Mixed Low-Level Waste (MLLW):

- Issuance of the Final TC & WM EIS to provide a basis for modeling assumptions used in the risk analyses;
- Issuance of a TC & WM EIS ROD to establish the wastes expected to be disposed in the facility;
- Preparation of the risk analyses required by the IDF Permit and submittal to Ecology. For consistency, the risk analyses developed to support the IDF Permit and applicable DOE Orders will be prepared concurrently. Disposal of Low-Level Waste in the IDF Cell 2 is solely regulated by DOE Orders;
- Completion of Ecology review of permit conditions III.11.I.2.a.ii and III.11.I.5.a deliverables and resolution of Ecology comments;
- Ecology modification of the IDF Permit and approval of the IDF Immobilized Low-Activity Waste acceptance criteria permit condition III.11.I.1.a., as appropriate; and
- Operation of the IDF for disposal of MLLW in accordance with Permit Conditions III.11.H.3 through III.11.H.5 and as required by other provisions of the IDF Permit.

Based on this sequence of activities, generation of the risk analyses for the IDF permit conditions III.11.I.2.a.ii and III.11.I.5.a will require at least 18 months after issuance of the Final TC & WM EIS. This preparation period is aggressive and similar documents have taken up to two years to produce. As a result, ORP suggests that the submittal date for the risk analysis be extended for at least 18 months after the issuance of the Final TC & WM EIS and ROD. We understand Ecology would like the risk analyses as soon as possible and ORP will work to accelerate this schedule. However, for planning purposes this provides a more realistic approach for setting new dates and will minimize the need for another modification of the IDF Permit if the TC & WM EIS schedule changes.

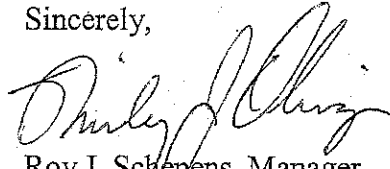
Ms. Jane A. Hedges
07-TPD-002

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JAN 26 2007

If you have any questions, you may contact me, or your staff may contact T. Zack Smith, Assistant Manager for Tank Farms Project, (509) 373-9112.

Sincerely,


for Roy J. Schepens, Manager
Office of River Protection

TPD:CSL

Attachment:
IDF Risk Analyses Processes

cc w/attach:

M. N. Jaraysi, CH2M HILL

M. S. Spears, CH2M HILL

S. Harris, CTUIR

J. J. Lyon, Ecology

T. Martin, HAB

G. Bohnce, NPT

M. S. McCormick, RL

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K. Niles, ODOE

R. Jim, YN

Administrative Record

CH2M HILL Correspondence

Environmental Portal, LMSI

INTEGRATED DISPOSAL FACILITY (IDF) RISK ANALYSES PROCESSES

IDF RCRA Permit Process

